

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 05-10059-DPW
)	
CHAD BENJAMIN,)	
)	
Defendant.)	

**JOINT MOTION FOR EXTENSION OF TIME WITHIN WHICH TO FILE
THE PARTIES' SUPPLEMENTAL FILINGS RELATIVE TO DEFENDANT'S
MOTION TO SUPPRESS, AND TO RESCHEDULE THE FURTHER
SUPPRESSION HEARING PRESENTLY SCHEDULED FOR MARCH 1, 2006**

The Parties respectfully move for a fifty-one (51) day extension of time within which to file any supplemental filings relative to Defendant Chad Benjamin's motion to suppress evidence, and to reschedule the further suppression hearing presently scheduled for March 1, 2006, until after the parties have filed any supplemental pleadings.

As grounds therefor, the Parties state the following:

1. The Parties' supplemental filings are presently due to be filed on February 22, 2006. A further hearing on Defendant's motion to suppress evidence is presently scheduled for March 1, 2006.

2. James P. Gibbons, Federal Court Reporter, has advised the Parties that he is unable to complete the suppression hearing transcripts before February 24, 2006. The transcripts are lengthy, and the Parties need significant time to review them in preparation for filing any supplemental pleadings.

3. Defense Counsel, Kevin J. Reddington, is presently on trial in a state murder case until February 24, 2006, and will start a one-week trial in a state wrongful death action case on

February 27, 2006 through March 3, 2006.

4. Attorney Reddington will also be on vacation for two weeks from March 6 - 17, 2006, and on March 20, 2006, he starts another state murder trial in Dedham Superior Court.

5. Government counsel, Assistant U.S. Attorney Antoinette E.M. Leoney, begins a one-week drug possession with intent to distribute trial before Judge Rya Zobel on March 20, 2006.

WHEREFORE, the Parties respectfully request that the Court grant them **until at least April 14, 2006** to file any supplemental pleadings to Defendant's motion to suppress evidence, and to reschedule the further suppression hearing presently scheduled for March 1, 2006, until such time thereafter that is convenient for the Court.

Respectfully submitted,

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CHAD BENJAMIN

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Date: February 21, 2006